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Guy M. Hicks
General Counsel

December 15, 1999

DEC 15 PM 4 02

EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition by ICG TELECOM GROUP, INC. for Arbitration of an Interconnection Agreement with BELLSOUTH TELECOMMUNICATIONS, INC. pursuant to Section 252(b) of the Telecommunications Act of 1996*
Docket No. 99-00377

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Late-Filed Exhibit 3. Copies of the enclosed are being provided to counsel of record for ICG.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

FILE

PM 4 02

Comparison of ICG's proposed measurements to Service Quality Measurements currently published by BellSouth
 Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

Tennessee Regulatory Authority
 Docket 99-00377
 Late Filed Exhibit 3

ICG Proposal <i>A blank cell indicates no comparable measurement to BST existing SQM</i>	Comments on ICG Proposal	BST Existing Service Quality Measurements. <i>A blank cell indicates no comparable measurement to ICG proposal.</i>	Comments on comparison of ICG and BST measurements	BellSouth Comments
1. RESALE POTS, RESALE SPECIALS AND UNEs A. Pre-Ordering/Ordering				
1. Average Response Time for OSS Pre-Order Interfaces		Average OSS Response Interval (Pre-Ordering)	<u>Similar measurements</u>	
2. Percent Response received within "X" Seconds -- OSS Interfaces		Percent Response received within "X" Seconds	<u>Similar measurements</u>	
3. EASE Average Response Time		LENS Average Response Time	<u>Similar measurements</u>	
		TAG Average Response Time		
		RNS Average Response Time		
4. OSS Interface Availability	Measures only 2 systems.	OSS Interface Availability	<u>Similar measurements.</u> BST measures 12 systems.	
5. % Firm Order Confirmations Returned within specified time.	A measure of FOC timeliness.	Firm Order Confirmation Timeliness	<u>Similar measurements</u>	Not necessary. Another way to measure FOC timeliness as Measurement #6 below does.
6. Average Time to Return FOC	Another way to measure FOC timeliness.	FOC Average Interval (Days)	<u>Similar measurements</u>	

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ICG Proposal <i>A blank cell indicates no comparable measurement to BST existing SQM</i>	Comments on ICG Proposal	BST Existing Service Quality Measurements. <i>A blank cell indicates no comparable measurement to ICG proposal.</i>	Comments on comparison of ICG and BST measurements	BellSouth Comments
7. % Mechanized Completions Avail within 1 hour of completion in SORD.	This is a provisioning measurement. There is no disaggregation provided.	Average Completion Notice Interval (Hours)	<u>Similar measurements.</u> The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Not necessary. Another way to measure Order Completion Notice timeliness as measurement #8 does. Additionally, SORD is a SBC system for which there may not be an equivalent in BellSouth.
7.1. % Mech. Completions Avail within 1 day of work completion	This is a provisioning measurement. It is also duplicative of the above measurement, with the exception of 1 day time frame vs. 1 hour. There is no disaggregation provided	Average Completion Notice Interval (Hours)	<u>Similar measurements.</u> The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Not necessary. Another way to measure Order Completion Notice timeliness as measurement #8 does.
8. Average Time to Return Mechanized Completions	This is a provisioning measurement. It is also duplicative of the above two measurements except it measures an average vs. at two time points.	Average Completion Notice Interval (Hours)	<u>Similar measurements</u> The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	
9. % Rejects	There is no product disaggregation provided.	% Rejected Service Requests – Mechanized.	<u>Similar measurements</u> The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	

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10. % Mech. Rejects within 1 Hour of receipt of reject in EDI/LASR		% Rejected Service Requests – Non-Mechanized. Reject Distribution Interval-Mechanized	<u>ICG's proposal excludes Non-Mechanized.</u> The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Not necessary. Another way to measure Reject Timeliness measurement #11 does.
11. Mean Time to Return Mechanized Rejects	Similar to measure #10. Another way to measure reject timeliness.	Reject Distribution Interval-Mechanized	<u>Similar measurements</u>	
11.1. Mean Time to Return Manual Rejects that are Received Electronically via LEX or EDI.		Reject Distribution Interval-Non Mechanized	<u>Similar measurements</u>	
12. Mechanized Provisioning Accuracy				Not necessary. Provisioning errors would result in either Installation Trouble Reports (Meas. #35, 46, 59, 89, 98) or billing adjustments as reflected in the measures below. In the NPRM, the FCC concluded ordering/provisioning errors should be measured by Installation Trouble Reports, (Docket CC 98-56, Par. 68)

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13. Order Process % Flow-Through		% Flow-Through Service Requests	<u>Similar measurements</u>	
		% Flow Through Service Requests Detail		
		% Flow Through Error Analysis		
B. Billing				

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14. Billing Accuracy		Invoice Accuracy Bill Auditing processes.	<u>Similar measurements.</u>	Not necessary. BST has a measure of Invoice Accuracy (SQM page 46) and BST conducts multiple bill audits each month. BellSouth's Invoice Accuracy measurement reflects the accuracy of the data within billing invoices that are actually delivered to the CLEC or to the BST end-user. If a billing error is identified and a bill is rejected within the current Bill Verification process (mechanism designed to correct errors before they are released) prior to delivery to the CLEC or to a BST end-user, the error is transparent to the customer. BellSouth believes that this measure is sufficient to assess the accuracy of the invoice. Large CLEC accounts typically represent the equivalent of several hundred to several thousand end-user accounts. Billing errors based on \$ adjustments of revenue is a more accurate measure for billing than random sampling which would look at only a small percentage of the bills.

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15. % of Accurate and Complete Formatted Mech. Bills				Not necessary and duplicative of Billing Accuracy (ICG #14). BST provides bills via EDI that are error free. If there is an out of balance situation, processes are stopped and errors are corrected before the bills go out.
16. % of Usage Records Transmitted Correctly		Usage Data Delivery Accuracy	<u>Similar measurements</u>	Not necessary and duplicative of Billing Accuracy. (ICG #14).
17. Billing Completeness				Not necessary. This measurement is one of service order completion not billing. The value of this measurement is not clear.
18. Billing Timeliness (Wholesale Bill)		Mean Time to Deliver Invoices	<u>Similar measurements</u>	
19. Daily Usage Feed Timeliness		Mean Time to Deliver Usage. Usage Data Delivery Timeliness	<u>Similar measurements</u>	
20. Unbillable Usage				Not necessary. If there is an issue here, it is self correcting. It is in BST's interest to bill the CLEC for usage.
		Usage Record Completeness		

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C. Miscellaneous Administrative				
21. LSC (Local Svc. Ctr.) Average Speed of Answer		Speed of Answer in Ordering Center (LCSC)	<u>Similar measurements</u>	
22. LSC Grade of Service (GOS)	Similar to 21 above. Another way to measure speed of answer.	Speed of Answer in Ordering Center (LCSC)	<u>Similar measurement</u> – in concept.	Not necessary. Another way to measure Speed of Answer as measurement #21 does.
23. % Busy in the Local Service Center			% Busy and Grade of Service are of little value to the CLEC. The primary measure of nondiscriminatory treatment is how long does it take to answer the call	Not necessary. Busy conditions are rare. Busy conditions, if present, would be a result of heavy calling volume, which would be reflected in Speed of Answer measurement (ICG #21).
24. (Local Opns. Ctr.) LOC Average Speed of Answer		Average Answer Time – UNE Center	<u>Similar measurements</u>	
25. LOC Grade of Service (GOS)	Similar to 21 above. Another way to measure speed of answer	Average Answer Time – UNE Center	<u>Similar measurements</u>	Not necessary. Another way to measure Speed of Answer as measurement #24 does.
26. % Busy in the LOC			% Busy and Grade of Service are of little value to the CLEC. The primary measure of nondiscriminatory treatment is how long does it take to answer the call	Not necessary. Busy conditions are rare. Busy conditions, if present, would be a result of heavy calling volume, which would be reflected in Speed of Answer measurement (ICG #24).

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II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY ILEC A. Provisioning		Average Answer Time -- Resale Maint. Center		
27. Mean Installation Interval		Average Order Completion Interval	<u>Similar measurements.</u> BST provides additional product disaggregation.	
28. % Installations completed within "X" Business Days-POTS	Similar to #27. Another way to measure installation interval.	Order Completion Interval Distribution	<u>Similar measurements.</u> BST provides additional product disaggregation.	Not necessary. Another way to measure Installation Interval as Measurement #27 does.
29. % SWBT Caused Missed Due Dates		% Missed Installation Appointments less % Missed Installation Apts Caused by End User.	<u>Similar measurements.</u> BST provides additional product disaggregation.	
30. % Company Missed Due Dates due to lack of Facilities		% Missed Installation Appointments. Mean Held Order Interval - Held for Facilities	<u>Similar measurements.</u> BST provides additional product disaggregation.	Not necessary. % Company Missed DD due to facilities is included in the % Company Caused Missed DD (#29). This is just a drill down of #29. The more critical issue is: "Did BellSouth miss the Due Date for ANY reason?" That is measured by #29.

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31. Ave. Delay Days for Missed DD due to lack of Fac.	A drill down of measure #32 below.	Mean Held Order Interval - Held for Facilities	<u>Similar measurements.</u> BST provides additional product disaggregation.	Not a critical measurement. While it is available in BST's SQM, it is simply a reason by reason drill-down of Delay Days for Missed Due Dates #32.
32. Average Delay Days for SWBT Missed Due Dates		Mean Held Order Interval	<u>Similar measurements.</u> BST provides additional product disaggregation.	
33. % SWBT Caused Missed Due Dates > 30 Days	Somewhat duplicative of measures 29 and 32.	Mean Held Order Interval	<u>Similar measurements</u>	Not necessary. This is somewhat duplicative of measures 29 and 32.
34. # of Orders canceled after the DD caused by SWBT				Not necessary and prone to misunderstanding. Not all cancellations after ILEC caused misses are attributable to the ILEC. The key, end-user affecting, measurement is #29 – Company Caused Missed Due Dates.
35. % Trouble Reports within 10 Days (1-10) of Installation		% Provisioning Troubles within 30 days	<u>Similar measurements</u>	
36. % No Access (Service Orders with No Access)		% Missed Installation Appointments – end user caused	<u>Similar measurements</u>	Not necessary. Another way to measure Company Caused Missed Due Dates (ICG #29).
		Held Order Interval Distribution		

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		Mean Held Order Interval - Held for Equipment		
		Mean Held Order Interval - Held for Other		
		% of Orders in Jeopardy		
		Average Jeopardy Notification Interval		
B. Maintenance				
37. Trouble Report Rate	No separation between troubles requiring a dispatch vs. non-dispatch. Product disaggregation is POTS - Res, POTS Bus and UNE Combo.	Customer Trouble Report Rate	<u>Similar measurements.</u> BST measurement provides additional disaggregation of troubles requiring dispatch and non-dispatch; product disaggregation is Resale Res, Resale Bus, Resale Design, UNE-Non Design.	
38. % Missed Repair Commitments	Product disaggregation is POTS - Res, POTS Bus and UNE Combo.	% Missed Repair Appointments	<u>Similar measurements.</u> BST product disaggregation is Resale Res, Resale Bus, Resale Design, UNE Design, UNE-Non Design.	
39. Receipt to Clear Duration	Product disaggregation is POTS - Res, POTS Bus and UNE Combo.	Maintenance Average Duration	<u>Similar measurements</u> BST product disaggregation is Resale Res, Resale Bus, Resale Design, UNE	

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40. % Out of Service (OOS) < 24 Hours	No separation between troubles requiring a dispatch vs. non-dispatch. Product disaggregation is POTS-Res, POTS Bus and UNE Combo.	% Out of Service (OOS) > 24 Hours	<u>Similar measurements.</u> BST measurement provides additional disaggregation of troubles requiring dispatch and non-dispatch. BST product disaggregation is Resale Res, Resale Bus, Resale Design, UNE	BST's measure is OOS greater than 24 hours. ICG's is the inverse.
41. % Repeat Reports in 10 days	No separation between troubles requiring a dispatch vs. non-dispatch. Product disaggregation is POTS	% Repeat Troubles within 30 Days	<u>Similar measurements.</u> BST measurement provides additional disaggregation of troubles requiring dispatch and non-dispatch. The 30 day window is a more stringent measurement of repeat reports.	
42. % No Access (% of Trouble Reports with No Access)				Not necessary. This is a measurement of CLEC and end-user miscommunication.
III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY ILEC				
A. Provisioning				
43. Average Installation Interval		Average Order Completion Interval	<u>Similar measurements</u>	

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44. % Installations completed within 20 Business Days	Similar to #43. Another way to measure installation interval.	Order Completion Interval Distribution	<u>Similar measurements</u>	Not necessary. Another way to measure Installation Interval as Measurement #43 does. 20 day interval appears arbitrary.
45. % SWBT Caused Missed Due Dates		% Missed Installation Appointments less % Missed Installation Appts Caused by End User.	<u>Similar measurements</u>	
46. % Trouble Reports within 30 Days (1-30) of Installation		% Provisioning Troubles within 30 days	<u>Similar measurements</u>	
47. % Company Missed Due Dates due to lack of Facilities		% Missed Installation Appointments. Mean Held Order Interval - Held for Facilities	<u>Similar measurements</u>	Not necessary. % Company Missed DD due to facilities is included in the % Company Caused missed DD (#45). This is just a drill down of #45. The more critical issue is .. "Did BellSouth miss the Due Date for ANY reason?" That is measured by #45.
48. Delay Days for Missed DDs due to lack of Facilities	A drill down of measure #49 below.	Mean Held Order Interval - Held for Facilities	<u>Similar measurements</u>	Not a critical measurement. While it is available in BST's SQM (Mean Held Order Interval - Facilities Page 18), it is simply a reason by reason drill-down of Delay Days for Missed Due Dates.

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49. Delay Days for SWBT Missed Due Dates		Mean Held Order Interval	<u>Similar measurements</u>	
50. % SWBT Caused Missed Due Dates > than 30 Days	Somewhat duplicative of measures 45 and 49.	Mean Held Order Interval	<u>Similar measurements</u>	Not necessary. This is somewhat duplicative of measures 45 and 49.
51. # of Orders canceled after the DD caused by SWBT				Not necessary and prone to misunderstanding. Not all cancellations after ILEC caused misses are attributable to the ILEC. The key, end-user affecting, measurement is #29 – Company Caused Missed Due Dates.
		Held Order Interval Distribution		
		Mean Held Order Interval - Held for Equipment		
		Mean Held Order Interval - Held for Other		
		% of Orders in Jeopardy		
		Average Jeopardy Notification Interval		
B. Maintenance				
52. Mean Time to Restore		Maintenance Average Duration	<u>Similar measurements</u>	
53. % Repeat Reports		% Repeat Troubles within 30 Days	<u>Similar measurements</u>	

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54. Failure Frequency		Customer Trouble Report Rate	<u>Similar measurements</u>	
		% Missed Repair Appointments		
		% Out of Service (OOS) > 24 Hours		
IV. UNBUNDLED NETWORK ELEMENTS (UNES) A. Provisioning				
55. Average Installation Interval		Average Order Completion Interval	<u>Similar measurements</u>	
55.1. Average Installation Interval – DSL		Average Order Completion Interval	<u>Similar measurements</u> – DSL is included with the UNE Design category.	
55.2. Average Installation Interval for Loop with LNP		Total Service Order Cycle Time for UNE Design, Non Design and Total Service Order Cycle Time for LNP.	<u>Similar measurements.</u>	
56. % Installations completed within "X" Business Days	Similar to #55. Another way to measure installation interval.	Total Service Order Cycle Time Distribution for UNE Design, Non Design and Total Service Order Cycle Time Distribution for LNP.	<u>Similar measurements</u> The % completion can be derived from the Completion Interval Distribution details.	Not necessary. Another way to measure Installation Interval as Measurement #55 does.

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56.1. % Installations completed within industry guidelines for LNP with Loop	Similar to #55.2. Another way to measure installation interval.	Total Service Order Cycle Time Distribution for UNE Design, Non Design and Total Service Order Cycle Time Distribution for LNP.	<u>Similar measurements.</u> The % completion can be derived from the Completion Interval Distribution details.	Not necessary. Another way to measure Installation Interval as Measurement #55.2 does.
57. Average Response Time for Loop Make-Up Information				Not necessary. Loop makeup information is one step of the ordering process and the time for loop makeup is included in FOC timeliness.
58. % SWBT Caused Missed Due Dates		% Missed Installation Appointments less % Missed Installation Apts Caused by End User.	<u>Similar measurements.</u>	
59. % Trouble Reports within 30 Days (1-30) of Installation		% Provisioning Troubles within 30 days	<u>Similar measurements.</u>	
60. % Missed Due Dates due to lack of Facilities		% Missed Installation Appointments. Mean Held Order Interval - Held for Facilities	<u>Similar measurements.</u>	Not necessary. % Missed DD due to facilities is included in the % Company Caused missed DD (#58). This is just a drill down of #58. The more critical issue is .. "Did BellSouth miss the Due Date for ANY reason?" That is measured by #58.

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61. Ave. Delay Days for Missed DDs due to lack of Facilities	A drill down of measure #62 below.	Mean Held Order Interval - Held for Facilities	<u>Similar measurements.</u>	Not a critical measurement. While it is available in BST's SQM, it is simply a reason by reason drill-down of Delay Days for Missed Due Dates #62.
62. Ave. Delay Days for SWBT Missed Due Dates		Mean Held Order Interval	<u>Similar measurements.</u>	
63. % SWBT Caused Missed Due Dates > than 30 Days	Somewhat duplicative of measures 58 and 62.	Mean Held Order Interval	<u>Similar measurements</u> in concept.	Not necessary. This is somewhat duplicative of measures 58 and 62.
64. # of Orders canceled after the DD caused by SWBT				Not necessary and prone to misunderstanding. Not all cancellations after ILEC caused misses are attributable to the ILEC. The key, end-user affecting, measurement is #58 – Company Caused Missed Due Dates.
		Held Order Interval Distribution		
		Mean Held Order Interval - Held for Equipment		
		Mean Held Order Interval - Held for Other		
		% of Orders in Jeopardy		
		Average Jeopardy Notification Interval		

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B. Maintenance				
65. Trouble Report Rate		Customer Trouble Report Rate	<u>Similar measurements.</u>	
66. % Missed Repair Commitments		% Missed Repair Appointments	<u>Similar measurements.</u>	
67. Mean Time to Restore		Maintenance Average Duration	<u>Similar measurements.</u>	
68. % Out of Service (OOS) < X Hours		% Out of Service (OOS) > 24 Hours	<u>Similar measurements.</u> The inverse.	BST's SQM Measurement is OOS greater than 24 hours. (SQM Page 41)
69. % Repeat Reports		% Repeat Troubles within 30 Days	<u>Similar measurements.</u>	
V. INTERCONNECTION TRUNKS				
70. % Trunk Blockage		Trunk Group Service Summary which individually tabulates local trunk groups and common transport groups.	<u>Similar measurements.</u>	
70.1. Count of Blocked calls excluded from % of Trunk Blockage				This measurement is not clear and would not appear to be critical.
71. Common Transport Trunk Blockage		Trunk Group Service Summary which individually tabulates local trunk groups and common transport groups.	<u>Similar measurements.</u>	

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72. Distribution of Common Transport Trunk Groups Exceeding 2% / 1%		Trunk Group Service Summary which individually tabulates local trunk groups and common transport groups. Trunk Group Service Detail.	<u>Similar measurements.</u>	
73. Percent Missed Due Dates		% Missed Installation Appointments less % Missed Installation Apts Caused by End User.	<u>Similar measurements.</u>	
74. Average Delay Days for Missed Due Dates		Mean Held Order Interval	<u>Similar measurements.</u>	
75. % SWBT Caused Missed Due Dates > 30 Days	Somewhat duplicative of measures 73 and 74.	Mean Held Order Interval	<u>Similar measurements.</u>	Not necessary. This is somewhat duplicative of measures 73 and 74.
76. Average Trunk Restoration Interval		Maintenance Average Duration	<u>Similar measurements.</u>	
77. Average Trunk Restoration Interval for Service Affecting Trunk Groups				Not necessary. This is a drill down of measurement #76. It is not clear if this includes CLEC originating groups. BST does not control these groups.
78. Average Interconnection Trunk Installation Interval		Average Order Completion Interval	<u>Similar measurements.</u>	
		Order Completion Interval Distribution		
		% of Orders in Jeopardy		

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		Average Jeopardy Notification Interval		
		% Provisioning Troubles within 30 days		
		Customer Trouble Report Rate		
		% Missed Repair Appointments		
		% Repeat Troubles within 30 Days		
		% Out of Service (OOS) > 24 Hours		
VI. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)				
79. Directory Assistance Grade of Service	Similar to #80. Another way to measure speed of answer.	Directory Assistance Average Speed of Answer	<u>Similar measurements.</u>	Not necessary. This is another way to measure DA Speed of Answer as reported by measurement #80

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80. Directory Assistance Average Speed of Answer		% Answered within "X" Seconds	<u>Similar measurements.</u>	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool. However the FCC and state commissions have ruled that this is a required measurement.
81. Operator Services Grade of Service	Similar to #82. Another way to measure speed of answer.	Operator Services (Toll) Average Speed of Answer	<u>Similar measurements.</u>	Not necessary. This is another way to measure Operator Svcs Speed of Answer as reported by measurement #82.
82. Operator Services Average Speed of Answer		% Answered within "X" Seconds	<u>Similar measurements.</u>	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool. However the FCC and state commissions have ruled that this is a required measurement.
83. % Calls Abandoned			Parity by Design - All calls go to the same Operator pool	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool.

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84. % Calls Deflected			Parity by Design – All calls go to the same Operator pool	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool.
85. Average Work Time			Parity by Design – All calls go to the same Operator pool	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool. Additionally Average Work Time is an internal efficiency measurement that should not be a concern of CLECs.
86. Non-Call Busy Work Volumes			Parity by Design – All calls go to the same Operator pool	Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool.
VII. INTERIM NUMBER PORTABILITY (INP)				
87. % Installation Completed within X (3,7,10) Bus. Days		Order Completion Interval Distribution. INP is included with UNE Design or UNE-Non-Design.	<u>Similar measurements.</u> CLEC ordering of INP is relatively small since metro areas have converted to LNP.	Not necessary. Another way to measure Installation Interval as Measurement #88 does.

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88. Average INP Installation Interval		Average Order Completion Interval. INP is included with UNE Design or UNE-Non-Design.	<u>Similar measurements.</u> CLEC ordering of INP is relatively little since metro areas have converted to LNP.	
89. % INP I-Reports within 30 Days		% Provisioning Troubles within 30 days. INP is included with UNE Design or UNE-Non-Design.	<u>Similar measurements.</u> CLEC ordering of INP is relatively little since metro areas have converted to LNP.	
90. % Missed Due Dates		% Missed Installation Appointments. INP is included with UNE Design or UNE-Non-Design.	<u>Similar measurements.</u> CLEC ordering of INP is relatively little since metro areas have converted to LNP.	
		Mean Held Order Interval. INP is included with UNE Design or UNE-Non-Design.		
		Held Order Interval Distribution. INP is included with UNE Design or UNE-Non-Design.		
VII. LOCAL NUMBER PORTABILITY (LNP)				
91. % LNP Due Dates within Industry Guidelines		Order Completion Interval Distribution	<u>Similar measurements</u> The % completion can be derived from the Completion Interval Distribution details.	Not necessary. Can be derived from Order Completion Interval Distribution (SQM Page 24).

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92. % of time the old Service Provider releases Subscription prior to the expiration of the second 9 hour timer				Not necessary. This is a diagnostic measurement of the number porting process. The key end-user affecting measurement is % Installation Appointments Met (analogous to % Company Caused Missed Due Dates.)
93. % of Customer account restructured prior to LNP due date				Not necessary. This is a diagnostic measurement of the number porting process. The key end-user affecting measurement is % Installation Appointments Met (analogous to % Company Caused Missed Due Dates.)
94. % FOCs received within "X" hours		Firm Order Confirmation Timeliness	<u>Similar measurements</u>	
95. Average Response Time for Non-mechanized Rejects Returned with complete and accurate codes				
96. % Premature Disconnects for LNP Orders	BellSouth will not issue disconnect until activate msg. is received from NPAC.			Not necessary. BellSouth does not issue a disconnect until the activate message is received from NPAC.

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97. % of Time SWBT applies the 10-digit trigger prior to the LNP Order Due Date		Percent Missed Installation Appointments and % Provisioning Troubles within 30 days.	Similar measurements. Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments.	
98. % LNP I-Reports in 10 days	Once number has been ported, installation troubles for the number would not be handled by BellSouth. If a UNE loop was associated with the service BellSouth troubles would be addressed in the UNE Loop category above.	% Provisioning Troubles within 30 days.	Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category.	
99. Average Delay Days for SWBT Missed Due Dates		Percent Missed Installation Appointments; Total Service Order Cycle Time	When taken together, these two BellSouth measurements address the intent of the SWBT measurement.	
100. Average Time of Out of Service for LNP conversions		Coordinated Customer Conversions.	Similar measurements.	

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101. % Out of Service < 60 Minutes		Coordinated Customer Conversions.	<u>Similar measurements.</u>	
		% Rejected Service Requests		
		Reject Distribution Interval-non-mechanized		
		% Flow Through Service Requests (Summary)		
		% Flow Through Service Requests (Detail)		
		Average Disconnect Timeliness Interval.		
		Disconnect Timeliness Interval Distribution.		
VIII. 911				
102. Average Time to Clear Errors			Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users E911 updates.	Not necessary. Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users' E911 updates.

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I03. % Accuracy for 911 database updates		% E911 Accuracy	<u>Similar Measurements.</u> Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users E911 updates.	Not necessary. Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users' E911 updates.
I04. Average Time Required to Update 911 Database		E911 Timeliness (% within 24 hours)	<u>Similar Measurements.</u> Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users E911 updates..	Not necessary. Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users' E911 updates.
		E911 Mean Interval and Interval Distribution	Parity by design. Both BST retail and CLEC resale updates are processed by third party. CLECs who serve end-users from a CLEC switch handle their end-users E911 updates.	
IX. POLES, CONDUIT AND RIGHTS OF WAY				

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105. % of requests processed within 35 days				Not necessary. This is not a critical measurement. In Louisiana – II, the FCC determined that BellSouth is in compliance with this check list item. CC Docket 98-121, Executive Summary and Par. 174.
106. Average Days required to Process a Request				Not necessary. This is not a critical measurement. In Louisiana – II, the FCC determined that BellSouth is in compliance with this check list item. CC Docket 98-121, Executive Summary and Par. 174.)
X. COLLOCATION				
107. % Missed Collocation Due Dates		% of Due Dates Missed	<u>Similar measurements.</u>	
108. Average Delay Days for SW/BT Missed Due Dates		% of Due Dates Missed. Average Arrangement Time	<u>Similar measurements when viewed together.</u>	
109. % of Requests processed within the tariffed timelines		Average Response Time	<u>Similar measurements.</u>	
XI. DIRECTORY ASSISTANCE DATABASE				

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110. % of updates completed into the DA Database within 72 hours for facility based CLECs			In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.	Not necessary. In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.
111. Average Update Interval for DA database for facility based CLECs			In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.	Not necessary. In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.
112. % DA Database Accuracy for Manual Updates			In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.	Not necessary. In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file.
113. % of electronic updates that flow through the DSR without manual intervention.	Measurement unclear. May be unique to SWBT processes.			Not necessary. In BellSouth this is parity by Design – Directory database updates from retail and wholesale customers are processed in the same batch file. In addition, this process may not be applicable in BellSouth.
XII. COORDINATED CONVERSIONS				

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114. % Pre-mature disconnects (Coordinated Cutovers)				
115. % SWBT caused delayed Coordinated Cutovers				Not a critical measurement and not necessary. Would be reflected in Customer Coordinated Conversion intervals (SQM Page 28)
116. % Missed mechanized INP conversions				Not necessary. Since the implementation of INP, there is very little INP activity.
		Average Cutover Interval		
		%Conversions in 5 Minutes		
		%Conversions between 5 and 15 Minutes		
		%Conversions > 15 Minutes		
XIII. NXX				
117. % NXXs loaded and tested prior to the LERG effective date.				Not necessary. This is not an important measurement based on no complaints despite a high volume of activity.
118. Average Delay Days for NXX loading and testing				Not necessary. This is not an important measurement based on no complaints despite a high volume of activity.

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119. Mean Time to Repair				Not necessary. This is not an important measurement based on no complaints despite a high volume of activity.
XIV. BONA FIDE REQUEST PROCESS (BFRs)				
120. % of Requests processed within 30 Business Days			YTD September 1999, BellSouth has only received a total of 48 BFRs from ALL CLECs in ALL 9 states. Therefore this measurement would have little value and would have to be manually tracked due to lack of activity to justify mechanization.	Not necessary due to low volumes. Between Jan and Sept 1999, only 48 BFRs have been received from all CLECs in all 9 states.
121. % Quotes Provided for Authorized BFRs within X(10,30,90) business days			See above.	Not necessary due to low volumes. Between Jan and Sept 1999, only 48 BFRs have been received from all CLECs in all 9 states.
Misc. Maintenance OSS				
		OSS Interface Availability		
		OSS Response Interval & Percentages		

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

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